

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

FILED

AUG 13 2015

[Signature]
CLERK

UNITED STATES OF AMERICA,

CR. 15-40075

Plaintiff,

SUPERSEDING INFORMATION

vs.

USE OF INTERSTATE FACILITIES TO
TRANSMIT INFORMATION ABOUT A
MINOR

BENJAMIN LYLE IVERSON,

Defendant.

18 U.S.C. § 2425

The Assistant United States Attorney charges and informs the Court:

On or about April 11, 2015, in the District of South Dakota, the defendant, Benjamin Lyle Iverson, using a facility and means of interstate commerce, that is, the internet on his cell phone, knowingly initiated and attempted to initiate the transmission of the name and electronic mail address of another individual knowing that other individual had not attained the age of 16 years, with the intent to entice, encourage, offer, or solicit any person to engage in any sexual activity for which any person can be charged with a criminal offense, including, but not limited to criminal prosecution for

solicitation of a minor, in violation of South Dakota Codified Laws 22-24A-5, all
in violation of 18 U.S.C. § 2425.

Dated this 13th day of August, 2015.

RANDOLPH J. SEILER
ACTING UNITED STATES ATTORNEY



Jeffrey C. Clapper
Assistant United States Attorney
P.O. Box 2638
Sioux Falls, SD 57101-2638
Telephone: (605)357-2351
Facsimile: (605)330-4410
E-Mail: jeff.clapper@usdoj.gov